

April 6, 2012

Kathleen Baskin, P.E.  
Director of Water Policy  
Executive Office of Energy & Environmental Affairs  
100 Cambridge Street, 9th floor  
Boston, MA 02114

Re: SWMI Framework Comments

Dear Ms. Baskin:

Thank you for the opportunity to comment on the proposed regulations. I commend all the state staff for embarking on this challenging and critical Initiative. Non-governmental environmental advocacy groups have submitted thoughtful and knowledgeable critiques of the Framework, which point out important provisions that need strengthening.

Overall, the Framework falls short of relating the issues of water management to the climate crisis. As stated by the Climate Research Center at UMass Amherst, *"Earth's climate system is undergoing a period of rapid change as a result of man-made interference with the climate system, superimposed on underlying natural variability. Changes are occurring at an unprecedented rate, with profound risks and consequences for all organisms on earth. The course of future interactions between climate and human society hinges upon policy decisions which must be based upon modern climate science."*

I am writing with two main comments as follows:

- 1) The regulatory structure should allow for consideration of potential climate change impacts in our region as they could affect water regimes, including streamflow, and groundwater and surface water storage.
- 2) The policies implemented through SWMI should not be in isolation from the climate adaptation policies of state and federal governments, and should recognize the importance of addressing water management in the context of climate change. Implementation should be informed by the latest research on climate change projections with the highest probabilities for our region.
- 3) Regarding the **Scope of the Pilot** and the additional information that would be helpful to gather, seek collaboration with the modeling efforts at the Climate Research Center at UMass Amherst, and NOAA's Regional Climate Center for the Northeast. Explore the opportunities for research focused on New England hydrologic conditions in the face of climate change.
- 4) I also underscore the recommendation by the MACC to *"design and implement a strong new regulatory system to prevent ecologically negative*

*outcomes, which must include regulations with clear numeric standards that place an upper limit on withdrawals based on scientifically corroborated minimum stream flow."*

Sincerely,

Susan Redlich  
19 Sacramento Street  
Cambridge, MA 02138

CC: [Linda.Orel@macweb.org](mailto:Linda.Orel@macweb.org)

Raymond S. Bradley, Director, Climate Research Center  
UMass Amherst, Department of Geosciences, 236 Hasbrouck,  
Amherst, MA, 01003 - USA